

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

DENNIS HANSCOM, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

NORDSEC LTD., NORDSEC B.V.,
NORDVPN S.A., NORD SECURITY INC.,
and TEFINCOM S.A. d/b/a NORDVPN,

Defendants.

CASE NO. 3:24-CV-00277-KDB-DCK

**DEFENDANTS' CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO THE AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1, Defendants NordSec Ltd., Nordsec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN (collectively "Defendants"), by special appearance, move for an extension of time up to and including August 21, 2024, to respond to the Amended Class Action Complaint in this matter. In support, Defendants state as follows:

1. Plaintiff filed this lawsuit against Defendants on March 5, 2024. Dkt. 1.
2. Defendants filed two consent motions to extend the time to respond to the Complaint, which the Court granted. Dkt. 13, 16, 25, 30. Defendants filed their Motion to Dismiss pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) on July 3, 2024. Dkt. 44.
3. On July 16, 2024, Plaintiff filed a consent motion to extend its time to amend the complaint until July 31, 2024. Dkt. 48. In that motion, Plaintiff also requested a commensurate extension for Defendants to respond to the amended complaint, up to and including August 21, 2024. *Id.*

4. On July 16, 2024, the Court granted the Plaintiff's consent motion only as to Plaintiff's request to extend his time to file an amended complaint. Dkt. 49. The Court did not address the request to extend Defendants' time to respond to the Amended Complaint. *Id.*

5. Plaintiff filed the Amended Complaint on July 31, 2024. Dkt. 50. Pursuant to Federal Rule of Civil Procedure 15(a)(3), Defendants have until August 14, 2024, to respond to the Amended Complaint.

6. Defendants request a modest extension of that deadline, up to and including August 21, 2024, to respond to the Amended Complaint to allow them sufficient time to review it and respond appropriately. The Amended Complaint includes new allegations concerning Defendants' alleged conduct as well as this Court's personal jurisdiction over the Defendants. *See* Dkt 50 ¶¶ 8-36. Defendants require additional time to investigate and respond to these new allegations.

7. Defendants' request is not made for the improper purpose of undue delay.

8. Defendants have conferred with counsel for Plaintiff and Plaintiff consents to the requested extension.

Accordingly, Defendants NordSec Ltd., Nordsec B.V., NordVPN S.A., Nord Security Inc., and Tefincom S.A. d/b/a NordVPN request that the Court grant this consent Motion extending Defendants' deadline to respond to the Amended Complaint up to and including August 21, 2024.

Dated: August 2, 2024

Respectfully submitted,

MCGUIREWOODS LLP

By: /s/ Jodie Herrmann Lawson

Jodie Herrmann Lawson

NC State Bar No. 42900

Jessica L. O'Brien

NC State Bar No. 56679

201 N. Tryon Street, Suite 3000

Charlotte, NC 28202

Telephone: (704) 343-2329

Facsimile: (704) 444-8785
jlawson@mcguirewoods.com
jobrien@mcguirewoods.com

FENWICK & WEST, LLP

Jedediah Wakefield
Ethan Thomas
Samuel Sahagian
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 650.938.5200
Email: jwakefield@fenwick.com
ethomas@fenwick.com
ssahagian@fenwick.com

Adam Gahtan
902 Broadway, 18th Floor
New York, NY 10010
Telephone: 212.430.2600
Facsimile: 650.938.5200
Email: agahtan@fenwick.com

*Counsel for Defendants NordVPN S.A., Nord Security
Inc., NordSec Ltd, NordSec B.V., and Tefincom S.A.*

CERTIFICATE OF SERVICE

I certify that on August 2, 2024, I electronically filed this Motion with the Clerk of Court using the CM/ECF system, which automatically provides electronic notice to all counsel of record.

/s/ Jodie Herrmann Lawson

Jodie Herrmann Lawson
NC State Bar No. 42900

*Counsel for Defendants NordVPN S.A., Nord
Security Inc., NordSec Ltd, NordSec B.V., and
Tefincom S.A.*